MAY 2 1991

Summary Notes From Pentachlorophenol Team Meeting-Suspension Notice April 17, 1991

Select members of the pentachlorophenol (PCP) Non-Wood Team met on Wednesday April to discuss and decide on the proposed suspension for the remaining biocide uses of PCP. The issue arose when the registrant failed to submit certain data required by the August 1988 Comprehensive Data Call-In (DCI) Notice.

After considerable debate, the team decided to defer issuing the suspension notice at this time. Rather, the team opted to seek answers to two key questions asked by the pentachlorophenol task force (PTF) regarding the choice of test substance for the technical and the Agency's response to the Low Volume Minor Use Waiver Exemption Request. RD and BEAD will cooperate in obtaining the necessary information to resolve the Low Volume Minor Use Waiver Exemption question. RD will obtain the decisions from HED and EFED as to whether the difference in composition for the technical will make a difference in the results of laboratory and field studies required by the 1988 DCI. Once these questions are answered, a decision can be made on how to proceed.

Other questions addressed included finding out where the biocide registrants obtained their technical material (RD has the lead) and whether the maintenance fees for the 5 registered PCP biocides had been paid (ARB has the lead).

The biocides containing PCP for non-wood uses are as follows:

BAF-Cide, Reg. No. 10967-8, Water Services Inc. Mitrol G- St Reg. No. 1022-527, Chapman Chemical Co. Chem-Aqua 450, Reg. No. 1769-325, NCH Corporation Skasol Microbiocide, Reg. No. 09743-1 AA, Skasol Corp. 71L, Reg. No. 15311-3, The Bond Chemical Company

71L was cancelled on January 22, 1991 for failure to pay the required maintenance fees. Skasol Microbiocide was suspended October 31, 1985 as a result of a product recall notice.

OGC advised that a suspension would be difficult to support under the circumstances and a better course of action might be for the Agency to first answer PTS's questions and require PTF to submit the required data under a new schedule.

The question of resource availability was addressed. PCP is a non-funded chemical for Fy 91. Therefore, if significant time is required to resolve issues surrounding the Special Review or the suspension, support units may not have the human or financial

resources to respond. It was concluded that resource limitations would have a greater impact on the special Review than on the issuance of a Suspension Notice.

A follow-up meeting of the PCP team will be scheduled once a decision on the technical material and the Low Volume Minor Use Waiver Exemption is made.

The following persons attended the meeting.

David Stangel Sidney Jackson Barbara Pace Jack Housenger Leung Cheng

A copy of these notes have been sent to the above attendees and the other PCP Non-Wood Team Members.

Respectfully submitted,

Spencer L. Duffy, PM/SRB